

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANU BHARDWAJ,

X

08-cv-6059(dab)

Plaintiff,

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

v.

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH, INC.,
CAPITOL HEALTH CONSULTANTS, INC., CAPITOL
HEALTH MANAGEMENT COMPANY LLC,
CAPITOL HEALTH MANAGEMENT CORPORATION,
CAPITOL HEALTH PARTNERS, LP, CAPITOL
HEALTH MANAGEMENT COMPANY II, INC.,
CAPITOL HEALTH PARTNERS III, LP, CAPITOL
HEALTH ADVISORS III, LLC, CAPITOL HEALTH
MANAGEMENT COMPANY III, INC., ABC
CORPORATIONS, XYZ PARTNERSHIPS/LIMITED
PARTNERSHIPS, JANE DOE AND RICHARD ROE,

Defendants.

X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Todd E. Duffy, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro
hac vice* of :

Paul H. Hulsey
Hulsey Law Group
Charleston Harbor
2 Wharfside 3
Charleston, South Carolina 29401
Tel: (843) 723-5303
Fax: (843) 723-5307

Paul H. Hulsey is a member in good standing of the Bars of the States of South Carolina
and Kansas. *See Exhibit A*, annexed hereto. There are no pending disciplinary

proceedings against Paul H. Hulsey in any State or Federal court. In addition, Paul H. Hulsey was admitted *pro hac vice* in a case pending before this Court, captioned *Ovesen v. Mitsubishi et al.*, Civil Case No. 04-cv-02849 (JGK), on February 26, 2008.

Dated: July 29, 2008
New York, New York

Respectfully submitted,

DUFFY & ATKINS LLP


Todd E. Duffy (ID 9863)
Seven Penn Plaza, Suite 420
New York, New York 10001
Tel: (212) 268-2685
Fax: (212) 500-7972

EXHIBIT A

The Supreme Court of South Carolina

Certificate of Good Standing

I, Daniel E. Shearouse, Clerk of the Supreme Court of South Carolina, do hereby certify that Paul H. Hulsey was duly sworn and admitted as an attorney in this state on May 7, 1990, and is currently an active member of the South Carolina Bar.

DANIEL E. SHEAROUSE, CLERK

BY *Hayli S. Weller*
DEPUTY CLERK FOR BAR ADMISSIONS

Columbia, South Carolina

July 17, 2008

The Supreme Court of Kansas



Certificate of Good Standing

I, **Carol G. Green**, Clerk of the Supreme Court of the State of Kansas, do hereby certify that the Supreme Court of Kansas is the highest court of law, and the court of last resort within the State of Kansas, and has exclusive jurisdiction over and control of the admission of applicants to the bar of this state.

I do further certify that on September 15, 1976,

PAUL H. HULSEY

was duly admitted to practice as an attorney and counselor of the Supreme Court and all other courts of the State of Kansas and is, on the date indicated below, a member in good standing of the Kansas Bar.

ACTIVE STATUS

Witness my hand and the seal of the Supreme Court, hereto affixed at my office in Topeka, Kansas, this 15th day of July, 2008.

Carol G. Green
Clerk of the Supreme Court of Kansas

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANU BHARDWAJ,

X

08-cv-6059(dab)

Plaintiff,

v.

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH, INC.,
CAPITOL HEALTH CONSULTANTS, INC., CAPITOL
HEALTH MANAGEMENT COMPANY LLC,
CAPITOL HEALTH MANAGEMENT CORPORATION,
CAPITOL HEALTH PARTNERS, LP, CAPITOL
HEALTH MANAGEMENT COMPANY II, INC.,
CAPITOL HEALTH PARTNERS III, LP, CAPITOL
HEALTH ADVISORS III, LLC, CAPITOL HEALTH
MANAGEMENT COMPANY III, INC., ABC
CORPORATIONS, XYZ PARTNERSHIPS/LIMITED
PARTNERSHIPS, JANE DOE AND RICHARD ROE,

AFFIDAVIT OF TODD E.
DUFFY IN SUPPORT OF
MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

Defendants.

X

Todd E. Duffy, being duly sworn hereby deposes and says as follows:

1. I am a member of the law firm of Duffy & Atkins LLP, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Paul H. Hulsey as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bars of the State of New York and New Jersey and was admitted to practice law in New York in 2000 and in New Jersey in 1999. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Paul H. Hulsey, a member of the Hulsey Law Group, since 2007 and have found him to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure. In addition, Paul H. Hulsey has been admitted *pro hac vice* in a matter pending before the Court, captioned *Ovesen v. Mitsubishi et al.*, Civil Case No. 04-cv-02849 (JGK).

4. Accordingly, I am pleased to move the admission of Paul H. Hulsey, *pro hac vice*.

5. I respectfully submit a proposed order granting the admission of Paul H. Hulsey, *pro hac vice*, which is attached hereto as Exhibit A.

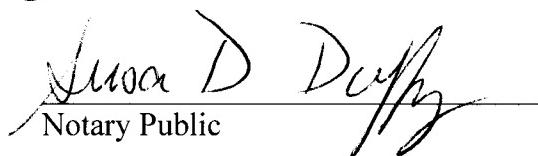
WHEREFORE it is respectfully requested that the motion to admit Paul H. Hulsey, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,

Dated: August 5, 2008
New York, New York


Todd E. Duffy (TD 9863)

Sworn before me this
5th day of August, 2008



Notary Public

SUSAN D. DUFFY
Notary Public, State of New York
No. 02DU6168953
Qualified in Queens County
Commission Expires June 18, 2011

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANU BHARDWAJ

Plaintiff,

08 cv 6059 (dab)

- against -

DEBORA A. GUTHRIE, ET AL. Defendant.

**ORDER FOR ADMISSION
 PRO HAC VICE
 ON WRITTEN MOTION**

Upon the motion of Todd E. Duffy attorney for Plaintiff Anu Bhardwaj and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Paul H. Hulsey
Firm Name:	Hulsey Law Group
Address:	2 Wharfside 3
City/State/Zip:	Charleston, South Carolina 29401
Telephone/Fax:	(843) 723-5303
Email Address:	phulsey@hulseylitigationgroup.com

is admitted to practice pro hac vice as counsel for Plaintiff Anu Bhardwaj in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
 City, State:

United States District/Magistrate Judge

DUFFY & ATKINS LLP

Seven Penn Plaza, Suite 420

New York, New York 10001

Todd E. Duffy (TD 9863)

James E. Atkins (JA 4922)

Dennis J. Nolan (DN 0853)

Attorneys for Anu Bhardwaj

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
ANU BHARDWAJ,

08-cv-6059 (dab)

Plaintiff,

v.

AFFIDAVIT OF SERVICE

DEBORA A. GUTHRIE, JOSEPH F. KELLY, JR.,
ESQUIRE, CAPITOL HEALTH ADVISORS, LP,
CAPITOL HEALTH GLOBAL, INC., CAPITOL
HEALTH GLOBAL, LLC, CAPITOL HEALTH,
INC., CAPITOL HEALTH CONSULTANTS, INC.,
CAPITOL HEALTH MANAGEMENT COMPANY
LLC, CAPITOL HEALTH MANAGEMENT
CORPORATION, CAPITOL HEALTH PARTNERS,
LP, CAPITOL HEALTH MANAGEMENT
COMPANY II, INC., CAPITOL HEALTH
PARTNERS III, LP, CAPITOL HEALTH ADVISORS
III, LLC, CAPITOL HEALTH MANAGEMENT
COMPANY III, INC., ABC CORPORATIONS,
XYZ PARTNERSHIPS/LIMITED PARTNERSHIPS,
JANE DOE AND RICHARD ROE,

Defendants.

-----X
STATE OF NEW YORK)
: ss.:
COUNTY OF NEW YORK)

SASHA L. MARTIN, being duly sworn and deposed says:

1. I am not a party to this action, am over eighteen years of age and reside in Bronx, New York.
2. That on the 5th day of August, 2008, I caused a true and correct copy of the following:
 - Motion To Admit Paul H. Hulsey as Counsel *Pro Hac Vice*;

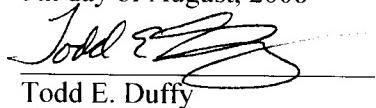
- Affidavit Of Todd E. Duffy In Support Of Motion To Admit Paul H. Hulsey as Counsel *Pro Hac Vice*; and
- Order For Admission *Pro Hac Vice* On Written Motion.

to be served by United States postal mail, postage prepaid upon those parties listed on Exhibit A.

Jonathan D. Perry, Esq.
Dechert LLP
1095 Avenue of the Americas
New York, New York 10036
Attorneys for Defendants

Dated: August 5, 2008
New York, New York

Sworn to before me this
5th day of August, 2008



Todd E. Duffy



Sasha L. Martin

TODD ERIC DUFFY
Notary Public, State of New York
No. 02DU6047594
Qualified in New York County
Commission Expires Sept. 5, 2010